

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANDRES SIMON-SALGADO,  
a/k/a ANDRES SALGADO,  
a/k/a JOHNATHAN AVILES-CARRILLO,  
a/k/a RAYMOND ZUNIGA,  
a/k/a RAYMOND CELSO,

Defendant.

INDICTMENT

The Grand Jury charges:

**Alien Felon Reentry**

On or about April 21, 2025, in Kent County, in the Western District of  
Michigan, Southern Division,

ANDRES SIMON-SALGADO,  
a/k/a ANDRES SALGADO,  
a/k/a JOHNATHAN AVILES-CARRILLO,  
a/k/a RAYMOND ZUNIGA,  
a/k/a RAYMOND CELSO,

being an alien who had previously been removed after having been convicted of a  
felony offense, was found in the United States without having obtained the express  
prior consent of the Attorney General or the Secretary of Homeland Security to  
return or reapply for admission.

8 U.S.C. § 1326(a)  
8 U.S.C. § 1326(b)(1)

A TRUE BILL

[ /s/ Redacted ]

---

GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE  
Acting United States Attorney



---

JONATHAN ROTH  
Assistant United States Attorney